

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

STEWARD HEALTHCARE SYSTEMS, LLC,	§	
	§	
Petitioner,	§	
	§	
vs.	§	CIVIL ACTION NO.
	§	
SANDRA PRUDHOMME	§	
	§	
Respondent.	§	

PETITION TO CONFIRM ARBITRATION AWARD

Petitioner Steward Healthcare Systems, LLC (“Steward”) files this Petition to Confirm Arbitration Award, respectfully showing the Court as follows:

I. PARTIES

1. Steward is a limited liability company organized under the laws of the State of Delaware and doing business in the State of Texas.

2. Respondent Sandra Prudhomme (“Prudhomme”) is an individual who resides in Jefferson County, Texas, and is a citizen of the State of Texas.

II. JURISDICTION

3. This Court has “federal question” jurisdiction over this Petition pursuant to the Federal Arbitration Act (“FAA,” 9 U.S.C. §§ 1–16)¹ and Title VII of the Civil Rights Act of 1964 (“Title VII,” 42 U.S.C. § 2000e).

¹ The FAA does not provide an independent basis for federal jurisdiction. The FAA does, however, provide authority for a federal district court to confirm an arbitration award if an independent basis for jurisdiction exists. Because Prudhomme asserted violations of Title VII of the Civil Rights Act of 1964 during the arbitration, the required independent basis for jurisdiction exists.

4. This Petition to Confirm Arbitration Award is filed within one year following the Arbitration Award granted by Arbitrator Cecilia H. Morgan, Esq. (the “Award”), which was finalized on January 10, 2022. Exhibit A.

III. VENUE

5. Venue is proper in this district under 28 U.S.C. § 1391(b)(1) because Prudhomme resides in this district.

6. Venue is also proper in this district under 28 U.S.C. § 1391(b)(2) because a substantial portion of the acts on which the arbitration was based occurred in Jefferson County, Texas.

IV. FACTUAL SUMMARY

7. On March 16, 2021, Prudhomme initiated her Demand for Arbitration with JAMS pursuant to an Arbitration Agreement between Prudhomme and Steward. *See* Exhibit B.

8. On July 14, 2021, Prudhomme submitted her Statement of Claims to JAMS, asserting claims for race, color, national origin and age discrimination and retaliation under Title VII and Chapter 21 of the Texas Labor Code.

9. On December 10, 2021, Steward filed a Motion for Summary Disposition and Brief in Support. Prudhomme filed her response to the Arbitrator on December 13, 2021.

10. On January 10, 2022, the Arbitrator ruled on the issues submitted to her and granted Steward’s Motion for Summary Disposition. In the Award, the Arbitrator ordered that Prudhomme take nothing from the arbitration. *See* Exhibit A.

11. A motion to confirm an arbitration award must be filed within one year after the award is made. 9 U.S.C. § 9. Steward filed this Petition to Confirm Arbitration Award within one year after the Award was made.

12. A motion to modify, correct, or vacate an arbitration award must be made within three months after the award is filed or delivered. 9 U.S.C. § 12. Prudhomme never filed a motion to modify, correct, or vacate the Award. As a result, any future motions to modify, correct, or vacate the Award would be untimely.

V. PRAYER FOR RELIEF

WHEREFORE, Steward respectfully requests the following:

- A. For an order confirming the Award;
- B. For judgment against Prudhomme in accordance with the Award;
- C. For costs of suit incurred in bringing this Petition; and
- D. For such other and further relief as the Court may deem proper.

RESPECTFULLY SUBMITTED,

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